



Department of Energy
Washington, DC

February 22, 2001

RCRA Docket Information Center
Office of Solid Waste (5305G)
U.S. Environmental Protection Agency
Headquarters (EPA)
Ariel Rios Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

EPA Docket Number F-2000-4BTA-FFFFF

Dear Sir or Madam:

Re: 65 FR 70678, "Notice of Availability of Draft Update IVB of SW-846"

On November 27, 2000, the U.S. Environmental Protection Agency (EPA) published a notice in the *Federal Register* requesting comment on the Draft Update IVB to the Third Edition of the EPA-approved test methods manual *Test Methods for Evaluating Solid Waste, Physical/ Chemical Methods*, EPA Publication SW-846. Comments were requested by February 26, 2001. This letter forwards the Department of Energy's consolidated comments on the Draft Update.

The Department appreciates the opportunity to comment on these proposed changes. If you have any questions or need further clarification of our comments, please contact Steven Woodbury of my staff at (202) 586-4371 or steven.woodbury@eh.doe.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "T. Traceski", is positioned above the printed name.

Thomas T. Traceski
Director, RCRA/CERCLA Division
Office of Environmental Policy and Guidance

Enclosures:

DOE comments
diskette (MS Word)

U.S. Department of Energy
Comments on the Proposed Update IVB to
Test Methods for Evaluating Solid Waste, Physical/Chemical Methods,
EPA Publication SW-846

1. Method 1040, “Test Method For Oxidizing Solids,”
Page 1040-7, paragraphs 11.2.6 and 11.2.7, and page 1040-13

Recommendation: Alter the order of the tests to first establish the burning time for the 3:7 standard, then test the waste. If the waste's burning time does not exceed the 3:7 mixture ratio burning time, then determine the 3:2 and 2:3 mixture ratio burning times to compare with that of the waste. In addition, to draw attention to the fact that the preparation of the 2:3 and 3:2 standard may not be necessary, it would be beneficial to add the words, “If required” to the first sentence of paragraphs 7.3.2 and 7.3.3. They would then read: “ ... -- If required, prepare in the same manner as”

Discussion: Method 1040 proposes a comparison between the burning time established by heating three different combinations of potassium bromate and cellulose as standards, and the burning time observed by heating the waste itself mixed with cellulose. The three standards range in oxidizing strengths from the least oxidizing, longest burning time mixture ratio of 3:7 (potassium bromate:cellulose), to the strongest oxidizing, shortest burning time mixture ratio of 3:2, with an intermediate oxidizing strength exhibited by the 2:3 mixture ratio. The test method suggests that one might be able to skip generating 2 of the 3 standards if the waste either does not ignite at all or has a burning time greater than the least oxidizing standard, the 3:7 mixture ratio (sections 2.2 and 9.1). However, the sequence prescribed in the method's text (11.2.6 - 11.2.7) as well as the logic diagram (page 1040 -13) does not have the analyst evaluate the burning time for the waste until after burning times for all 3 standards have been determined.

2. Method 1050, “Test Methods to Determine Substances Likely to Spontaneously Combust,” Page 1050-2, paragraphs 2.1 and 2.2

Recommendation: Include the phrase “whichever occurs first” at the end of the third sentence in paragraphs 2.1 and paragraph 2.2.

Discussion: Test Methods A and B require repeating certain activities up to five times unless a positive result is obtained. This is clearly stated in paragraphs 9.0, 11.1.6 and 11.2.4. Elsewhere the procedure is described as “repeated five times or until a positive result is obtained”; the phrase “whichever occurs first” should be included at the end of such statements for clarity.